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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA
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10 EVE T. MANDELL,

11 Plaintiff,

12 v.

13 CAROLYN W. COLVIN,
 Acting Commissioner of Social
 14 Security,

15 Defendant.

Case No.: 2:13-CV-00012-GMN-PAL

16 **UNOPPOSED MOTION FOR EXTENSION OF TIME**
 17 **(First Request)**

18 COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security
 19 (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Carlos A.
 20 Gonzalez, Assistant United States Attorney, to request that this Court extend the time to respond to
 21 Plaintiff's Motion for Reversal and/or Remand. This is Defendant's first request for an extension of
 22 time. Plaintiff's counsel was contacted on July 16, 2013, and Plaintiff does not oppose Defendant's
 23 motion. Defendants' current deadline is July 17, 2013.

24 The instant request is not intended to cause delay and is necessary because Defendant needs
 25 additional time to consider the issue involved in this case and because of the heavy workload of
 26 Defendant's attorney assigned to this case. Defendant's counsel has completed a draft of Defendant's

1 Cross-Motion to Affirm; however, Defendant needs additional time to complete the internal agency
2 review process. In addition, counsel assigned to this case has three additional District Court briefs due
3 within a week of the deadline in this case, in addition to other agency matters.

4 It is therefore respectfully requested that Defendant be granted a thirty (30) day extension of
5 time to respond to Plaintiff's motion, up to and including August 16, 2013.

6 Dated: July 17, 2013.

7 Respectfully submitted

8 DANIEL G. BOGDEN
9 United States Attorney


10 /s/ Carlos A. Gonzalez
11 CARLOS A. GONZALEZ
Assistant United States Attorney

12 OF COUNSEL:

13 DONNA L. CALVERT
Acting Regional Chief Counsel

14 ELLINOR R. CODER
15 Assistant Regional Counsel
16 Social Security Administration

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18 IT IS SO ORDERED:

19 
20 _____

21 UNITED STATES DISTRICT JUDGE
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: July 22, 2013

1 **CERTIFICATE OF SERVICE**

2 I, Carlos A. Gonzalez, certify that the following individual(s) were served with a copy of the
3 foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method
4 of service, identified below:

5 **CM/ECF:**

6 Marc V. Kalagian, Esq.
7 Rohlfing & Kalagian, LLP
8 211 East Ocean Boulevard, Suite 420
9 Long Beach, CA 90802
Email: marc.kalagian@rksslaw.com

10 Dated this 17th day of July, 2013

11 */s/ Carlos A. Gonzalez*
12 **CARLOS A. GONZALEZ**
13 Assistant United States Attorney
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